

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2020 JAN 15 PM 2:55

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

**BRYAN CALLIER JONES,**  
(Counts 1 and 2)

**JEFFREY ALLEN FILLERS,**  
(Counts 1 and 2)

**GAVIN JAMES WATT,**  
(Count 1)

and

**TODD DENNIS HARRIS,**  
(Count 1)

Defendants.

No.

MARGARET BOTKINS, CLERK  
CHEYENNE

20-cr-23-S

**Ct 1: 21 U.S.C. §§ 846 and 841(a)(1)  
and (b)(1)(A)**  
(Conspiracy to Distribute and  
Manufacture Marijuana)

**Ct 2: 18 U.S.C. § 1956(h)**  
(Conspiracy to Launder Monetary  
Instruments )

**Forfeiture Notice**

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**INDICTMENT**

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THE GRAND JURY CHARGES THAT:

**COUNT ONE**

From January 2010, through and including December 6, 2019, in the District of Wyoming and elsewhere, the Defendants, **BRYAN CALLIER JONES, JEFFREY ALLEN FILLERS, TODD DENNIS HARRIS, and GAVIN JAMES WATT**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with other persons known and unknown to the Grand Jury to distribute and manufacture 1000 kilograms or more of marijuana, a Schedule I controlled substance.

In violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A).

## COUNT TWO

From January 2011, through and including December 6, 2019, in the District of Wyoming and elsewhere, the Defendants, **BRYAN CALLIER JONES** and **JEFFREY ALLEN FILLERS**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18 United States Code Section 1956 and Section 1957, to wit:

- (A) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is manufacture and distribute marijuana in violation of Title 21, United States Code, Section 841(a)(1) and conspiracy to manufacture and distribute marijuana in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of such specified unlawful activity, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);
- (B) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is manufacture and distribute marijuana in violation of Title 21, United States Code, Section 841(a)(1) and conspiracy to distribute and manufacture marijuana in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and the control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and
- (C) to knowingly engage and attempt to engage in monetary transactions by, through or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is manufacture and distribute marijuana in violation of Title 21, United States Code, Section 841(a)(1) and conspiracy to manufacture and distribute marijuana in violation of Title 21, United States Code, Section 846, in violation of Title 18, United States Code, Section 1957.

All in violation of 18 U.S.C. § 1956(h).

## FORFEITURE ALLEGATION I

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), (a)(2) and (p).

2. Upon conviction of the violation alleged in Count One of this Indictment, the Defendants, **BRYAN CALLIER JONES, JEFFREY ALLEN FILLERS, GAVIN JAMES WATT, and TODD DENNIS HARRIS**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property, real or personal, constituting or derived from any proceeds that the Defendants obtained, directly or indirectly, as a result of the violation charged in Count 1 and any of the property, real or personal, used, or intended to be used, in any manner or part, to commit and to facilitate the commission of the violation charged in Count 1, including, but not limited to:

### A. PERSONAL PROPERTY

1. 2017 White Ford Expedition, VIN: 1FMJK1MT3HEA83068
2. 2019 Black Tesla, Model X, VIN: 5YJXCBE24KF193043

### B. REAL PROPERTY

1. **6586/6588/6900 Upper Cow Creek Road, Azalea, Oregon**

*That portion of the South half of the Northwest quarter, and the Southwest quarter of Section 28, Township 31 South, Range 4 West, Willamette Meridian, Douglas County, Oregon, lying Northerly and Westerly of the centerline of Cow Creek. Excepting therefrom all that portion of the above described property lying Southerly of the following described line: Beginning at a ¾ inch iron pipe set in the West line of the above said Section 28 from which the Southwest corner of said Section 28 bears South 2 degrees 09 minutes West 1060.75 feet; thence East 2105 feet, more or less, to the centerline of Cow Creek. Also excepting therefrom County Road No. 36 and portions Deeded to Douglas County, by Recorder's No. 83-9611, 84-10434, 86-14903, and 86-15532, Records of Douglas County, Oregon.*

2. **12959 Water Gap Road, Williams, Oregon**

*A parcel of land in the northeast quarter of the northeast quarter and the northwest quarter of the southeast quarter of Section 2, Township 38 South, Range 5 west of the Willamette Meridian, Josephine County, Oregon, being more particularly described as follows: beginning at the northeast corner of said northeast quarter of the southwest quarter; thence west 40 feet to the east right of way line of Water Gap Road; thence along said right of way line southerly 450 feet to the true point of beginning; thence south 68 degrees 35' east 320.00 feet; thence south 21 degrees 25' west 210.00 feet; thence south 68 degrees 35' east 250.00 feet; thence south 21 degrees 25' west 290.00 feet; thence north 68 degrees 35' west 600 feet, more or less, to the easterly right of way line of Water Gap Road; thence along said right of way line northerly 485 feet, more or less, back to the true point of beginning.*

3. **Parcels located in Debusk Estates, more specifically, lots 5, 10, 11, and 12**

*Situate in the 9<sup>th</sup> Civil District of Greene County, Tennessee, and being Lot Nos. 5, 10, 11, and 12 of Debusk Estates (a redivision of Lots 3 and 4 of the Burkey Property), a plat of which is found of records in Plat Cabinet J, Slide 108, Register's Office for Greene County, Tennessee, to which reference is here made for a more complete description. Being a portion of the property conveyed to JEFFREY ALLEN FILLERS Homes, LLC by deed of Jackie L. Seaton and wife, Melba Carlene Seaton, dated August 24, 2012, and recorded in Deed Book 515A, page 1390. Register's Office for Greene County, Tennessee.*

**C. UNITED STATES CURRENCY**

1. \$4060.00 seized from 218 Pleasant Valley Estates Drive, Eureka, Missouri
2. \$4,320.00 seized from 2385 Grand Teton Circle, Jackson, Wyoming
3. \$29,100 seized from 12959 Water Gap Road, Williams, Oregon

**D. UNITED STATES CURRENCY SEIZED FROM BANK ACCOUNTS**

1. U.S. currency in the amount of \$21.00 contained in the First Community National Bank Account Number XX1018
2. U.S. currency in the amount of \$574.99 contained in the Bank of Jackson Hole Account Number XX3342
3. U.S. currency in the amount of \$6,108.37 contained in the First Community National Bank Account Number XX3540
4. U.S. currency in the amount of \$118,374.07, contained in the First Community National Bank, Account Number XX5623

**E. SUBSTITUTE ASSETS**

In the event any of the foregoing property:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 18, to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

This pursuant to Title 21, United States Code, Sections 853(a)(1), (a)(2) and (p).

**FORFEITURE ALLEGATION II**

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of the violations alleged in Count Two of this Indictment involving violations of Title 18, United States Code, Sections 1956(h) and 1957, the Defendants **BRYAN CALLIER JONES** and **JEFFREY ALLEN FILLERS** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) any and all of the Defendants' right, title and interest in all property, real or personal, involved in such offense, or all property traceable to such property, including, but not limited to:

**A. PERSONAL PROPERTY**

1. 2017 White Ford Expedition, VIN: 1FMJK1MT3HEA83068
2. 2019 Black Tesla, Model X, VIN: 5YJXCBE24KF193043

**B. REAL PROPERTY**

1. **6586/6588/6900 Upper Cow Creek Road, Azalea, Oregon**

*That portion of the South half of the Northwest quarter, and the Southwest quarter of Section 28, Township 31 South, Range 4 West, Willamette Meridian, Douglas County, Oregon, lying Northerly and Westerly of the centerline of Cow Creek. Excepting therefrom all that portion of the above described property lying Southerly of the following described line: Beginning at a ¾ inch iron pipe set in the West line of the above said Section 28 from which the Southwest corner of said Section 28 bears South 2 degrees 09 minutes West 1060.75 feet; thence East 2105 feet, more or less, to the centerline of Cow Creek. Also excepting therefrom County Road No. 36 and portions Deeded to Douglas County, by Recorder's No. 83-9611, 84-10434, 86-14903, and 86-15532, Records of Douglas County, Oregon.*

2. **12959 Water Gap Road, Williams, Oregon**

*A parcel of land in the northeast quarter of the northeast quarter and the northwest quarter of the southeast quarter of Section 2, Township 38 South, Range 5 west of the Willamette Meridian, Josephine County, Oregon, being more particularly described as follows: beginning at the northeast corner of said northeast quarter of the southwest quarter; thence west 40 feet to the east right of way line of Water Gap Road; thence along said right of way line southerly 450 feet to the true point of beginning; thence south 68 degrees 35' east 320.00 feet; thence south 21 degrees 25' west 210.00 feet; thence south 68 degrees 35' east 250.00 feet; thence south 21 degrees 25' west 290.00 feet; thence north 68 degrees 35' west 600 feet, more or less, to the easterly right of way line of Water Gap Road; thence along said right of way line northerly 485 feet, more or less, back to the true point of beginning.*

3. **Parcels located in Debusk Estates, more specifically, lots 5, 10, 11, and 12**

*Situate in the 9<sup>th</sup> Civil District of Greene County, Tennessee, and being Lot Nos. 5, 10, 11, and 12 of Debusk Estates (a redivision of Lots 3 and 4 of the Burkey Property), a plat of which is found of records in Plat Cabinet J, Slide 108, Register's Office for Greene County, Tennessee, to which reference is here made for a more complete description. Being a portion of the property conveyed to JEFFREY ALLEN FILLERS Homes, LLC by deed of Jackie L. Seaton and wife, Melba Carlene Seaton, dated August 24, 2012, and recorded in Deed Book 515A, page 1390. Register's Office for Greene County, Tennessee.*



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2. \$4,320.00 seized from 2385 Grand Teton Circle, Jackson, Wyoming
3. \$29,100 seized from 12959 Water Gap Road, Williams, Oregon

**D. UNITED STATES CURRENCY SEIZED FROM BANK ACCOUNTS**

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2. U.S. currency in the amount of \$574.99 contained in the Bank of Jackson Hole Account Number XX3342
3. U.S. currency in the amount of \$6,108.37 contained in the First Community National Bank Account Number XX3540
4. U.S. currency in the amount of \$118,374.07, contained in the First Community National Bank, Account Number XX5623

**E. SUBSTITUTE ASSETS**

In the event any of the foregoing property:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

This is pursuant to Title 21, United States Code, Section 853(p) and Title 18, United States Code, Section 982(a)(1).

A TRUE BILL:

Ink Signature on File in Clerk's Office  
FOREPERSON

  
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MARK A. KLAASSEN  
United States Attorney



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**PENALTY SUMMARY**

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**DEFENDANT NAME:** **BRYAN CALLIER JONES**

**DATE:** January 13, 2020

**INTERPRETER NEEDED:** No

**VICTIM(S):** No

**OFFENSE/PENALTIES:**

**Ct: 1 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**  
(Conspiracy to Distribute Marijuana)

10 years to Life Imprisonment

Up To \$10,000,000 Fine

5 Years Supervised Release

\$100 Special Assessment

**Ct: 2 18 U.S.C. § 1956(h)**  
(Conspiracy to Launder Monetary Instruments )

0-20 Years Imprisonment

Fine Of \$500,000 Or Twice The Value Of The Property

Involved In The Transaction Whichever Is Greater

3 Years Supervised Release

\$100 Special Assessment

**TOTALS:** 30 Years to Life Imprisonment  
Fine Of \$1,500,000 Or Twice The Value Of The Property  
Involved In The Transaction Whichever Is Greater  
3 Years Supervised Release  
\$200 Special Assessment

**AGENT:** Justin C. Vanderbilt, DEA

**AUSA:** Stephanie A. Hambrick, Assistant United States Attorney

**ESTIMATED TIME OF  
TRIAL:**

More than 5 days

**WILL THE GOVERNMENT  
SEEK DETENTION IN THIS  
CASE:**

No

**ARE THERE DETAINERS  
FROM OTHER  
JURISDICTIONS:**

No

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** JEFFREY ALLEN FILLERS

**DATE:** January 13, 2020

**INTERPRETER NEEDED:** No

**VICTIM(S):** No

**OFFENSE/PENALTIES:**

**Ct: 1 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**  
(Conspiracy to Distribute Marijuana)

10 years to Life Imprisonment

Up To \$10,000,000 Fine

5 Years Supervised Release

\$100 Special Assessment

**Ct: 2 18 U.S.C. § 1956(h)**  
(Conspiracy to Launder Monetary Instruments )

0-20 Years Imprisonment

Fine Of \$500,000 Or Twice The Value Of The Property

Involved In The Transaction Whichever Is Greater

3 Years Supervised Release

\$100 Special Assessment

**TOTALS:** 30 Years to Life Imprisonment  
Fine Of \$1,500,000 Or Twice The Value Of The Property  
Involved In The Transaction Whichever Is Greater  
3 Years Supervised Release  
\$200 Special Assessment

**AGENT:** Justin C. Vanderbilt, DEA

**AUSA:** Stephanie A. Hambrick, Assistant United States Attorney

**ESTIMATED TIME OF  
TRIAL:**

More than 5 days

**WILL THE GOVERNMENT  
SEEK DETENTION IN THIS  
CASE:**

No

**ARE THERE DETAINERS  
FROM OTHER  
JURISDICTIONS:**

No

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** GAVIN JAMES WATT

**DATE:** January 13, 2020

**INTERPRETER NEEDED:** No

**VICTIM(S):** No

**OFFENSE/PENALTIES:**

**Ct: 1** 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)  
(Conspiracy to Distribute Marijuana)

10 years to Life Imprisonment

Up To \$10,000,000 Fine

5 Years Supervised Release

\$100 Special Assessment

**AGENT:** Justin C. Vanderbilt, DEA

**AUSA:** Stephanie A. Hambrick, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** More than 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** No

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** No

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** **TODD DENNIS HARRIS**

**DATE:** January 13, 2020

**INTERPRETER NEEDED:** No

**VICTIM(S):** No

**OFFENSE/PENALTIES:**

**Ct: 1 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**  
(Conspiracy to Distribute Marijuana)

10 years to Life Imprisonment

Up To \$10,000,000 Fine

5 Years Supervised Release

\$100 Special Assessment

**AGENT:** Justin C. Vanderbilt, DEA

**AUSA:** Stephanie A. Hambrick, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** More than 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** Yes

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** No